

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

JOHN ZOURDOS, HELEN ZOURDOS, and  
DIMITRIOS ZOURDOS,

Case No. 5:20-cr-298 (DNH)

Defendants.

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**DEFENDANTS' JOINT VOIR DIRE REQUESTS**

Defendants John Zourdos, Helen Zourdos, and Dimitrios Zourdos respectfully request that the Court inquire into general matters with regard to each potential juror, including the juror's name; city of residence; employment; educational background; the occupation of the juror's spouse, domestic partners, parents, and children; and similar matters.

Defendants also request that the Court read or summarize the Indictment in the case to potential jurors, subject to striking certain surplusage to which Defendants object.

Defendants request that the Court incorporate the following case-specific questions into its voir dire of prospective jurors:

1. Do you or does someone close to you work for a federal or state agency including but not limited to the United States Department of Treasury, United States Internal Revenue Service, NYS Department of Taxation and Finance, or any other agency involved in the regulation of activities related to the collection of taxes?
2. Have you ever dealt with these agencies?
3. Have you or someone close to you been the subject of a tax audit by one of these agencies?

4. Do you or someone close to you have ties to law enforcement or a history in law enforcement?
5. Are you or is someone close to you engaged, in any fashion, with issues concerning the Internal Revenue Service?
6. Are you or is someone close to you engaged, in any fashion, with issues concerning the payment or collection of taxes?
7. Have you or has someone close to you ever worked in a field or occupation related to tax issues?
8. Have you ever hired a company to calculate and file your income tax returns? If so, were you involved in the process?
9. Have you prepared your income tax returns on your own and without assistance?
10. Do you or does someone close to you have specialized knowledge, experience, education or interest in tax related matters, including the calculation or collection of tax payments, tax regulations, or tax laws?
11. Do you have any knowledge of or interest in federal, state, or local tax laws, including tax collection laws or regulations?
12. Do you have any knowledge or interest in criminal prosecutions involving tax related activities?
13. Are you or is someone close to you engaged, in any fashion, with accounting or bookkeeping matters?
14. Have you ever worked for a small business or sole-proprietorship? If so, did you deal with money?
15. Have you ever owned or operated a small business or sole-proprietorship?

16. Have you or has someone close to you worked in a donut shop, bakery, or similar business?
17. Have you or has someone close to you worked in a fast food restaurant or similar business?
18. Have you ever worked as a cashier or in a similar role? If yes, in what type of business?
19. Do you or does someone close to you have personal concern about the tax payment or collections systems and processes?
20. Are you or is someone close to you involved in a business, occupation or line of work that is regulated by local, state, or federal government agencies?
21. Do you work in a field or industry that is highly regulated by any government agency?
22. Have you ever had a complaint or dispute with an employer over wages or salary?
23. Have you ever been paid in cash for work?
24. Do you recognize that it is legal to pay employees with cash?
25. Do you agree that an individual could violate a tax regulation innocently, unknowingly or unintentionally?
26. Do you agree that an innocent, unintentional violation of an administrative regulation or rule does not mean that a crime has been committed?
27. Do you have any moral convictions of any type related to the collection and payment of taxes?
28. Have you ever been a defendant in a criminal case? If yes, what was the outcome of the case?

29. Have you ever been a party to a civil lawsuit? If yes, what was your role? What was the outcome of the case?

Dated: October 22, 2021

**DAVID M. GARVIN, P.A.**

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